

## REMARKS

Applicants and the undersigned are most grateful for the time and effort accorded the instant application by the Examiner. The Office is respectfully requested to reconsider the rejections presented in the outstanding Office Action in light of the following remarks.

Applicants appreciate the acknowledgement of the claim of priority based upon European Patent Application No. 00113438.6. Applicants note the Office's comments regarding purported differences between the instant application and the European application. The comment regarding differences in shading of item 43.2 in Fig. 4F is not understood. Furthermore, it is respectfully submitted that any of the purported differences set forth in the Office Action are of no moment.

The requirement for submission of an Information Disclosure Statement (IDS) is noted. While Applicants disagree submission of an IDS is required given the nature of the references, in order to expedite prosecution Applicants are submitting herewith an IDS. It should be noted Applicants have not submitted a copy of "the work of B. Mandelbrot and K. Wilson" referred to on Page 14, line 17. This statement in the application is in the nature of a source of general background, and is not a reference to a particular publication.

Figures 4C and 4F of the drawings are objected to because "Item 42.1 is a pointer and a square in Fig. 4F when a different item numbering convention might lessen misunderstanding" and "Items 47.x in fig. 4C are pointers that don't have at least one

direction of termination.” These objections are respectfully traversed. It appears these objections are obviated by a review of the application, which provides, *inter alia*, “The term **network** is herein used to describe a collection or aggregation of entries/elements. These entries/elements are – at least to some extent – connected/linked by pointers or connection objects. Pointers or connection objects are semantic units themselves.” (Page 12, lines 4-7) and “A **higher-order network** is a directed or non-directed graph in which pointers can at the same time be nodes.” (Page 16, lines 15-17) Applicants respectfully submit the objections to the drawings should be withdrawn.

The specification has been objected to because of a number of asserted informalities. The specification has been amended to correct a number of the asserted informalities, including amended the title of the application to that suggested by the Office. Applicants, however, respectfully traverse alleged informalities 1, 6, and 7. It is respectfully submitted that the language on Page 11, line 7, regarding Figures 1 and 4A is appropriate as it generally refers to classifying and segmenting/structuring an input network. The objection to the language at Page 21, lines 7-8 is not understood. Clarification is requested. The objection to item 40.6 at page 28, line 8, is not understood given the parallelism of “objects 50.1 - 50.5” and “semantic units 40.1 - 40.5”. Clarification is requested.

Claims 1-36 were pending in the instant application at the time of the outstanding Office Action. Claims 1, 25, 30, and 34 are independent claims; the remaining claims are dependent claims.

Claims 1-36 stand rejected under 35 USC 101 because the disclosed invention is inoperative and therefore lacks utility and under 35 USC 112, first paragraph, for failing to comply with the enablement requirement as when utility is lacking, a person skilled in the art would not be able to use the invention as claimed. These objections are not presently understood and clarification is requested from the Office. Should it be necessary to amend the claims to address these rejections, the undersigned would be amenable to making any such amendments over the telephone.

Claims 1-5, 7-15, and 20-36 stand rejected under 35 USC 102(b) as being anticipated by Ausborn. Claims 6 and 16-19 stand rejected under 35 USC 103(a) as being unpatentable over Ausborn in view of three identified judicial decisions. It is assumed the judicial decisions are cited for principles of law, not for technical propositions. Thus, Ausborn is the only applied reference. Reconsideration and withdrawal of the present rejections are hereby respectfully requested.

Independent Claims 1, 25, 30, and 34 all recite an **input network**. Claims 1, 25, and 34 also recite a **knowledge network**. It is respectfully submitted that neither an input network or a knowledge network is taught nor suggested by the applied art. As best understood, Ausborn is directed to a method and apparatus which translates natural language words into a plurality of categories of meaning. There is nothing in the reference that addresses input networks and knowledge networks.

In view of the foregoing, it is respectfully submitted that Independent Claims 1, 25, 30, and 34 fully distinguish over the applied art and are thus in condition for allowance. By virtue of dependence from what are believed to be allowable Independent

Claims 1, 25, 30, and 34, it is respectfully submitted that Claims 2-24, 26-29, 31-33, and 35-36 are also presently allowable. Notice to the effect is hereby earnestly solicited.

Applicants' undersigned attorney would welcome further discussion with the Office in the event there are any further issues with this application.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Stanley D. Ference III", written over a horizontal line.

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